

**DECLARATION OF MIA MAZZA IN SUPPORT  
OF APPLE'S OPPOSITIONS TO SAMSUNG'S  
MOTION FOR SANCTIONS AND MOTION TO  
ENFORCE**

**EXHIBIT 3**

March 6, 2012

**Peter J. Kolovos**

**VIA ELECTRONIC MAIL**

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Re: Apple Inc. v. Samsung Electronics Co. Ltd. et al.,  
Case No. 11-cv-01856-LHK (N.D. Cal.)

Dear Rachel and Diane:

I write regarding Samsung's request for additional deposition time with Tony Blevins in the ND Cal matter and its noticed ND Cal deposition of Saku Hieta (served on February 27).

As an initial matter, Apple objects to Samsung's eleventh-hour notice of Mr. Hieta's deposition. Apple submitted Mr. Hieta's declaration in support of its partial summary judgment motion over a month ago, and Samsung could have served a notice for his deposition at any time thereafter, rather than wait until the eve of the fact discovery deadline. Apple also disagrees that Samsung is entitled to any additional deposition time with Mr. Blevins.

Nonetheless, in the spirit of compromise, Apple is willing to designate the transcript from the February 23 deposition of Mr. Blevins as 30(b)(6) testimony for the ND Cal matter. In addition, Apple is willing to make Mr. Blevins available for an additional half day of 30(b)(6) testimony in the ND Cal matter. We are checking Mr. Blevins' availability, but it will not be on or before March 8, 2012. In return, Samsung would agree to withdraw its notice for the deposition of Mr. Hieta. As you know, both Messrs. Blevins and Hieta work in the supply chain area. Designating the Blevins testimony as corporate testimony and offering an additional half-day of testimony from Mr. Blevins moots any need for Mr. Hieta's deposition.

This offer is conditioned on Samsung's agreement that providing Mr. Blevins for additional deposition time after March 8 will not be used as a basis for seeking postponement of any other deadlines in the case.

Please let us know if this is agreeable so that we can finalize a schedule.

Very truly yours,

*/s/ Peter J. Kolovos*

Peter J. Kolovos